



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 16, 2022

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ashine McRae*, S1 21 Cr. 587 (LGS)

Dear Judge Schofield:

The Government respectfully submits this letter on behalf of the parties to request an adjournment of the conference currently scheduled for September 19, 2022 at 10:30 a.m. The parties have been engaged in ongoing plea negotiations and require additional time to discuss potential dispositions in the case. Defense counsel has also informed the Government that he will be engaged in a lengthy upcoming trial and will therefore require further time to engage in plea discussions with his client. The defense requests that the Court adjourn the conference in this matter to the week of November 28, 2022. The Government has no objection to defense counsel's request.

In light of the parties ongoing plea negotiations, the Government moves for the exclusion of time under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(1)(D) and (h)(7)(A), until November 28, 2022, or any alternative date for a conference scheduled by the Court. The exclusion of time will afford the parties time to continue their discussions regarding the potential for a pretrial disposition. The defense consents to this application.

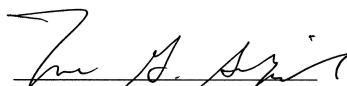
Application Granted. The status conference previously scheduled for September 19, 2022, is adjourned to **November 29, 2022, at 11:00 a.m.** The Court finds that the ends of justice served by excluding the time between today and November 29, 2022, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because the parties are presently engaged in discussions regarding a potential disposition of this matter and the exclusion would allow for those discussions to continue. It is hereby ORDERED that the time between today and November 29, 2022, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 51.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Mitzi S. Steiner
Assistant United States Attorney
(212) 637-2284

Dated: September 19, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE